



CELNOR GROUP LTD

ESG Statement 2026



CEO Statement

As Celnor continues to grow, we want to ensure we do so responsibly and with a clear understanding of the impact we have on our people, clients, communities and the environment.

This ESG Statement sets out what that means in practice. It gives our growing Group a shared framework and clear priorities across ethical business, our people, health and safety, environmental responsibility and sustainable procurement, while allowing our specialist businesses to retain their individual strengths.

This is about building responsible practices into the way we grow and operate, measuring our progress and continuing to improve. By working together across Celnor, we can build a stronger, more sustainable Group and make a positive difference to society and the planet through both how we operate and the services we provide.

Simon Parrington

Founder and CEO

OUR STATEMENT AIMS

ESG vision and strategic importance

Summarise Celnor's long-term ESG ambition and why consistent practices are essential for sustainable, acquisition-driven growth.

A unified approach across the Group

Explain how ESG guides decisions across specialist companies and how shared values and a common framework create alignment.

Stakeholders and governance

Highlight key stakeholder expectations and outline how the Board, Executive Leadership Team and ESG Committee ensure oversight and accountability.

2026 priorities and commitments

Call out the major objectives and KPIs for 2026 covering ethics, fair employment, wellbeing, safety, environmental compliance and sustainable procurement.

Culture, support and the future

Emphasise efforts to build a responsible culture through initiatives such as Celnor People, ESG Network, and provide a forward-looking view of how ESG maturity will continue to grow.



ABOUT CELNOR

Founded in 2023, Celnor is a growing group of specialist businesses providing testing, inspection, certification and compliance (TICC) services. The group delivers reliable data and practical consultancy that help organisations operate safely and responsibly while meeting environmental and occupational regulatory requirements.

Celnor is organised into four divisions: Safety and Compliance, Risk Management, Analytical Sciences and Built Environment. With more than forty companies operating across a nationwide and international network, the group continues to expand through investment and targeted acquisitions, increasing both capability and reach.

Celnor provides impartial consultancy, monitoring and analysis, and accredited testing across occupational hygiene, workplace exposure, air, water and asbestos. The group also supports clients in the food, pharmaceutical, agricultural and industrial sectors, and contributes to the development and maintenance of safe and sustainable infrastructure through site investigations, surveying and materials testing.



ESG AT CELNOR

Environmental, Social and Governance (ESG) considerations guide how Celnor operates and grows as a group.

They reflect the organisation's commitment to acting responsibly, supporting the wellbeing of colleagues and communities, and understanding the impact of its work on people and the environment.

As a young and expanding organisation, Celnor is working to embed consistent ESG practices that shape everyday decisions and strengthen long term resilience.

This report sets out our vision, strategy and goals, and describes how we are developing a strong and consistent ESG approach as we grow.

OUR DIVISIONS



Built Environment

Our Built Environment division delivers a wide range of services to support infrastructure and development projects, including geotechnical and geoenvironmental consulting, site investigation contracting, and soil testing with laboratory analysis. The team also provides ecological and arboricultural surveying, as well as topographic, utility, land, and marine surveying, along with specialist materials testing and laboratory analysis to ensure quality, safety, and sustainability in construction.



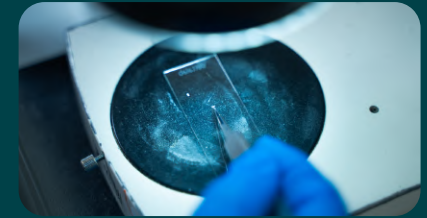
Safety & Compliance

Our Safety & Compliance division provides specialist support to help organisations meet regulatory and operational standards. Services include environmental testing, asbestos consultancy and analysis, and water compliance and hygiene. The division also provides working at-height compliance and training, environmental claims management, and workplace health and safety compliance, ensuring safe, sustainable, and fully compliant operations.



Risk Management

Our Risk Management division offers specialist services to help organisations identify, manage, and reduce risks across the built environment. Expertise includes building surveying and consultancy, fire and façade engineering, and water quality consultancy and verification. The division also provides expert workplace health and safety guidance to support safe, resilient, and compliant operations.



Analytical Sciences

Our Analytical Sciences division delivers specialist laboratory and research services, including contract research for animal and food safety, as well as laboratory testing and consultancy for energy providers. These services provide high-quality analysis and expert insight to support safety, compliance, and innovation.

OUR STAKEHOLDERS

Shareholders and other interested parties play an important role in shaping our ESG approach. Their expectations and insights help guide responsible decisions and support long term, sustainable performance across the Group.

As we continue to grow, Celnor works with a wide range of stakeholders whose views help shape what we focus on. Their feedback reflects the issues that matter most to them, including how we manage the environment, support our people, protect data and deliver safe, reliable services. Listening to these perspectives helps us understand what responsible practice looks like in the real world.

Each group supports us in different ways, whether through governance, collaboration or practical knowledge of everyday operations. Together they help ensure that our ESG approach remains grounded, clear and aligned with our responsibilities. Their input strengthens the quality of our decisions and supports a culture that values openness, responsibility and long-term thinking.



OUR STAKEHOLDERS

Employees

Our colleagues are at the heart of Celnor. Their experience and ideas help shape how we work, improve safety and wellbeing, and strengthen our culture. Regular engagement with employees gives us practical insight into what they need and how we can support them.

Celnor Group Companies

Each company within the Group brings its own strengths, expertise and established ways of working. Their insight helps us understand what responsible practice looks like across different environments and sectors. By working collaboratively, we ensure that our ESG approach is consistent across the Group while remaining practical and relevant to how each business operates.

Customers

Our customers trust us to deliver accurate, reliable and responsible services. Their expectations help shape how we work, from safety and environmental standards to data protection and quality. Their feedback helps us understand what matters most to them and where we can continue to improve.

Shareholders

Our shareholders help guide the long-term direction of the Group. Their expectations, questions and oversight support responsible decision making and encourage us to stay focused on sustainable growth. Their involvement also helps us remain transparent, accountable and aligned with the values that underpin our work.

Supply Chain Partners

Our suppliers provide the specialist equipment, technical services and subcontracted expertise that support our work. Their standards and reliability influence the quality of the services we deliver, and we aim to build responsible and transparent relationships with them.

Industry Bodies and Experts

Colleagues and leaders across the Group contribute to industry bodies and expert panels. Their involvement helps shape good practice in our sectors and keeps us connected to new developments.

Government and Regulatory Authorities

Much of the work carried out across the Group takes place in highly regulated sectors, where clear rules and standards shape what responsible practice looks like. These regulatory requirements guide the way our services are delivered and influence the expectations placed on our companies. By staying aligned with these standards, we help ensure that our work is safe, compliant and trusted by the industries and communities we support.

Communities

We aim to make a positive contribution to the communities where our companies operate. Through local relationships, volunteering and support for charities and initiatives, we work to create benefits that reflect the interests of our colleagues and the needs of local areas.

ESG GOVERNANCE AND OVERSIGHT

Effective oversight is central to embedding ESG across a growing organisation. As Celnor continues to expand, clear leadership and structured governance help ensure that ESG principles guide the decisions that shape our development and long-term direction. This provides confidence that responsible practice is considered at the highest level.

A coordinated approach allows Celnor to monitor progress, address risks and identify opportunities in a consistent way. It also helps ensure that expectations for responsible practice are understood and supported across the organisation as it grows, creating a stable foundation for sustainable performance.

This overarching governance structure guides the wider organisation by setting clear roles, maintaining regular oversight and promoting open communication. Through this framework, Celnor aims to ensure that ESG remains a practical and integrated part of how the organisation operates, now and in the future.

GROUP COLLEAGUES

GROUP COMPANIES

BOARD OF DIRECTORS

Provides strategic oversight, holds accountability for ESG performance

EXEC LEADERSHIP TEAM

Ensures day-to-day management and an implementation of ESG priorities

ESG COMMITTEE

Coordinates activity and monitors progress against ESG commitments

This overarching governance structure is intended to guide all group companies, helping to build a shared and aligned approach to ESG as the organisation grows.

ESG GOVERNANCE AT CELNOR

Board of Directors

Celnor's Board sets strategic direction and oversees long-term performance, ensuring ethical governance and retaining ultimate accountability for ESG priorities.

The Board oversees material risks and opportunities, monitors progress, and ensures ESG is embedded into strategy, decision making and risk management.

A mix of Executive and Independent Non-Executive Directors provides balanced leadership and constructive challenge.

Executive Leadership Team

The Executive Leadership Team is responsible for delivering the strategy set by the Board and managing day-to-day performance across the group.

It translates ESG expectations into operational plans, allocates resources, and ensures ESG priorities are embedded in business activity.

The team oversees material ESG risks, drives implementation and tracks progress against agreed targets.

ESG Committee

The ESG Committee coordinates activity across the business to support delivery of Celnor's sustainability strategy.

It identifies emerging risks and opportunities, oversees data collection and reporting, and ensures ESG actions are implemented consistently across the organisation.

The Committee provides regular updates to the Executive Leadership Team, enabling informed decisions and effective oversight.

Committee members include business leaders from Celnor Group companies to ensure each division has representation.

OUR ESG POLICY AND STATEMENT

Introduction and Scope

This Policy outlines Celnor's commitments on Environmental, Social and Governance (ESG) matters and applies to those working within the Celnor Group. Celnor is committed to operating responsibly, supporting the wellbeing of its people and communities, and managing environmental and social impacts with integrity. As a growing group of specialist businesses, we will integrate ESG considerations into strategy, investment decisions and day-to-day operations.

Our approach is informed by internationally established standards, including the UN Global Compact, and we have prioritised the most relevant UN Sustainable Development Goals, focusing on where Celnor can have the most meaningful and measurable impact. We will also use the EcoVadis model to provide a structured, evidence-based framework for developing and assessing our ESG strategy, supporting consistent measurement and continuous improvement.

SDG 8	_____	Decent Work and Economic Growth
SDG 3	_____	Good Health and Wellbeing
SDG 11	_____	Sustainable Cities and Communities

Policy Principles

Environment

We are committed to reducing our environmental footprint and supporting clients in managing theirs. Through our technical expertise, such as air and water quality monitoring, environmental risk assessment and compliance services, we help create safer, cleaner and more sustainable environments. Internally, we seek opportunities to reduce waste, improve resource efficiency and adopt practices that minimise environmental impact as we grow.

Social

Celnor fosters a safe, inclusive and respectful working environment. We prioritise health and wellbeing, set clear expectations around safety and encourage social connection across the Group. Wellbeing initiatives, networking opportunities and group-wide activities help colleagues feel supported and engaged. As new businesses join, we focus on consistent, people-centred approaches that support career development and strengthen leadership capability.

Governance

Strong governance underpins our approach. Our Board, Executive Leadership Team and ESG Committee provide clear oversight and accountability for ESG performance. We are committed to ethical conduct, transparent reporting and compliance with relevant laws and regulations. We will continue to strengthen policies and processes that support integrity, manage risk and ensure responsible growth.

OUR ESG POLICY AND STATEMENT

Responsibilities

Board of Directors:

Owns this Policy, sets ESG ambition and risk appetite, oversees performance, and reviews progress at least annually.

Executive Leadership Team:

Implements strategy, allocates resources, integrates ESG into business plans and acquisitions, and reports on performance and emerging risks.

ESG Committee:

Coordinates delivery, maintains the ESG framework, sets common metrics, consolidates reporting and recommends improvements.

All Colleagues:

Follow health, safety, environment and ethics requirements; contribute to an inclusive culture; and escalate concerns appropriately.

Arrangements

Targets, Data & Reporting

We will set measurable ESG objectives aligned to this Policy, collect data against defined metrics and report performance quarterly to the ESG Committee and annually to the Board. External reporting will be proportionate to the Group's size, maturity and stakeholder expectations.

Risk Management & Compliance

ESG risks and opportunities are integrated into enterprise risk management, acquisitions and key decision-making. Celnor will comply with all applicable laws and expects equivalent standards from suppliers and partners.

Training and Awareness

Celnor will promote awareness of this Policy by providing proportionate guidance and support to employees, including onboarding for newly acquired businesses where appropriate.

Review

This policy is reviewed periodically to ensure it remains suitable, effective and aligned with legal requirements, Government guidance and Celnor's governance and wider ESG framework. Any significant updates will be communicated across the Group.

Approval

This policy has been approved by the Board of Directors of Celnor Group Limited.

Signed:

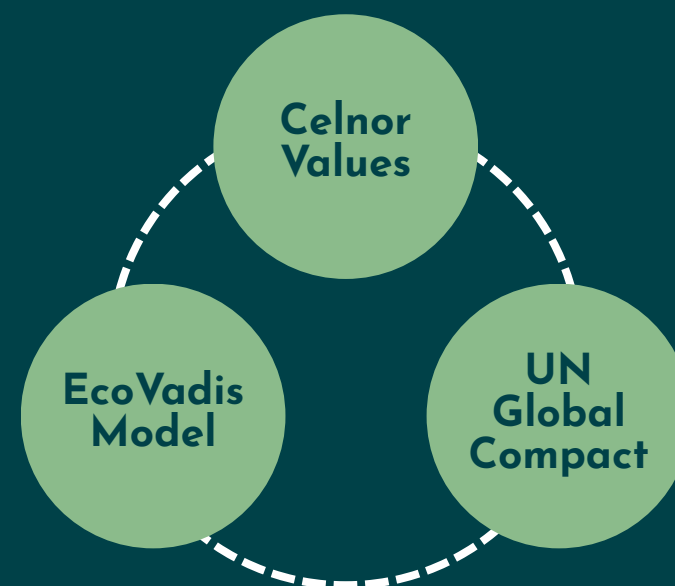
Name: Simon Parrington
Title: Group Chief Executive
Date: March 2026

ESG FRAMEWORK

Celnor's ESG framework brings together three complementary elements, each serving a distinct purpose. **Our Core Values** help shape how ESG is applied across the Group, ensuring that sustainability remains aligned with our culture, priorities and the behaviours we want to promote as we continue to grow.

The UN Global Compact provides an internationally recognised set of principles covering human rights, labour, the environment and anti-corruption. These principles provide a valuable reference point, helping ensure our ESG approach reflects widely accepted expectations for responsible business conduct.

The EcoVadis model provides the practical structure for implementation. Through its four themes of Environment, Labour & Human Rights, Ethics and Sustainable Procurement, it helps us organise priorities, assess performance and identify opportunities for improvement. Together, these elements create a framework that is aligned with international principles, relevant to Celnor's business and practical to implement across the Group.



MEMBER COMPANIES

The framework is intended to guide sustainability efforts across the Group, offering a shared structure that companies can adopt in full or align with alongside their existing programmes.

OUR CORE VALUES

Safety

We prioritise safety in everything we do, ensuring a safe and secure working environment for all our colleagues.

Collaborative

We drive collaboration between our companies through trust and relationships.

Client-focused

We put our clients at the heart of everything we do, bringing flexibility, innovation, and determination to exceed expectations in our solutions and services.

Ambitious

We enable our teams to grow through investment, support, and leadership, without sacrificing their autonomy.

Thoughtful

We aim to deliver sustainable solutions for our clients, the environment, and the communities around us.

Celnor's core values form the foundation of how the Group operates, bringing together its specialist companies under a shared commitment to safety, high standards, client satisfaction and sustainable growth.

These values guide behaviours, shape strategic decisions, and ensure that collaboration, responsibility and long-term thinking remain central as the organisation continues to expand across its specialist divisions.



UN GLOBAL COMPACT AND SDGS

The UN Global Compact is grounded in ten universal principles covering human rights, labour, the environment and anti-corruption, offering a values-driven foundation for responsible business conduct. It also encourages companies to contribute to the UN Sustainable Development Goals (SDGs), taking action on broader societal challenges such as climate action, decent work and reduced inequalities.

For Celnor, these principles form an aspirational reference point that supports the development of a coherent and forward-looking ESG strategy. As part of this work, the Group has identified a set of priority SDGs that best reflect its impact, capabilities and the nature of the services it provides. These goals offer a practical framework for focusing effort where Celnor can make the most meaningful contribution - both through the way it supports its people and through the technical expertise it delivers to clients and communities.



OUR PRIORITY SDGS

SDG#8: Decent Work and Economic Growth

Celnor is strengthening decent work and economic growth by bringing specialist businesses together under a shared commitment to responsible and ethical employment. The Group is establishing strong governance, building high-quality jobs and investing in colleagues as it grows.

As new companies join, Celnor introduces consistent, people-focused approaches, develops leadership capability and creates opportunities for individuals to build their skills and progress in their careers. This approach supports decent work across the Group and helps to shape a responsible, forward-looking organisation.

SDG#3: Good Health and Wellbeing

Celnor supports good health and wellbeing by prioritising safe working environments and setting clear expectations around health and safety. It also encourages social connection by fostering an inclusive culture and offering wellbeing initiatives, networking opportunities and group-wide activities that help colleagues feel supported and engaged.

The Group's technical expertise in occupational hygiene, air and water quality monitoring, asbestos removal and exposure testing further protects health by identifying risks, preventing harmful exposure and helping clients maintain safe, compliant environments. Through this combination of cultural and technical efforts, Celnor contributes to healthier workplaces and communities.

SDG#11: Sustainable Cities and Communities

Celnor's Built Environment and Risk Management divisions help create safer, more resilient and sustainable places to live and work. Through site investigations, materials testing, asbestos assessment, environmental monitoring and compliance services, the Group supports responsible development and reduces risks associated with pollution, structural failure and poor environmental management.

These contributions enhance the safety and sustainability of urban environments and reflect Celnor's commitment to supporting well-designed, well-managed and healthier communities.

ECOVADIS MODEL

The EcoVadis model provides the Celnor Group with a globally recognised, evidence-based framework that will help shape and measure the development of its ESG strategy across four core themes: Environment, Labour & Human Rights, Ethics and Sustainable Procurement.

It is built around 21 sustainability criteria, drawn from international standards, although some criteria will be more relevant than others depending on organisational context. EcoVadis offers a clear structure for benchmarking performance, identifying priority areas, and informing a phased, scalable approach to strengthening sustainability practices over time.

Environment

Operations

- Energy Consumption & GHGs
- Water
- Biodiversity
- Materials, Chemicals & Waste

Products

- Product use
- Product end-of life
- Customer Health & Safety
- Environmental services and advocacy

Labour & Human Rights

Human Resources

- Employee Health & Safety
- Working conditions
- Social dialogue
- Career management & training

Human Rights

- Child labor, forced labor, & human trafficking
- Discrimination & harassment
- External Stakeholder human rights

Ethics

- Corruption
- Anticompetitive practices
- Responsible information management

Sustainable Procurement

- Supplier environmental practices
- Supplier social practices

ecovadis®

OBJECTIVES AND KPIS

Celnor's ESG objectives and KPIs are informed by the framework set out in the previous section, which highlights the areas that matter most to the organisation. Using our Core Values, the priority SDGs, and the key EcoVadis themes as a guide allows us to focus on what is most relevant to our work and the expectations placed on us.

To refine these priorities, we reviewed which issues are most significant for the organisation and how they fit within our ESG structure. This process shaped the materiality assessment and mapping that follow, and the resulting objectives and KPIs translate these priorities into clear actions that will guide how we measure progress.

These objectives and KPIs will be reviewed and updated each year to reflect the growth of the organisation and any changes in expectations, risks or opportunities. This annual cycle helps ensure that our ESG approach remains current, practical and aligned with the needs of the organisation over time

MATERIALITY ASSESSMENT

With the ESG framework defined through our Core Values, the UN Global Compact, the priority SDGs and the EcoVadis model, we then evaluated which issues were genuinely material to Celnor's operations and growth. This materiality assessment ensured that our ESG approach is not generic or theoretical, but grounded in the realities of our business model, our acquisition-driven expansion, and the expectations of our colleagues, clients and stakeholders.

To determine materiality, we examined each element of the framework through three lenses:

- **Operational relevance**

Where the issue directly affects how work is delivered across multiple Group companies, such as safety, employment practices or data handling.

- **Risk and responsibility**

Where inconsistency or poor practice would expose Celnor to reputational, regulatory or ethical risk, including governance, modern slavery and environmental compliance.

- **Impact potential**

Where Celnor's technical expertise and services allow us to create wider positive outcomes, for example through safe workplaces, healthy environments and sustainable communities.

By reviewing the framework through this structured lens, it became clear which topics required Group-wide action and which were secondary or supportive. This process highlighted not only the areas most relevant to our operations today, but also where our rapid integration of new companies creates a need for consistent standards, systems and expectations.

MATERIALITY MAPPING

Once the material topics were identified, they were grouped under the four themes of our ESG framework: Ethics, Labour & Human Rights, Environment and Sustainable Procurement. This step helped clarify where Celnor needed to set common standards, where specialist expertise should be formalised into policy, and where targeted action would provide the greatest benefit.

Each of the 12 ESG objectives represents a direct response to a material issue identified in this process. For example:

- **Differences in ethical governance across acquired companies**

Objectives on Codes of Conduct, whistleblowing and professional standards

- **Variations in people practices**

Objectives on fair employment, wellbeing, safety and leadership capability

- **Key operational environmental impacts**

Objectives relating to environmental compliance, waste, emissions and resource use

- **Supplier-related risks**

Objectives focused on sustainable procurement and responsible supply chain practices

Celnor's KPIs then translate the objectives into measurable actions. They provide clear indicators that show whether each objective is being successfully implemented. These indicators focus on practical steps that can be tracked across all Group companies, such as audits, training, policy adoption, certification, or the submission of consistent data. The KPIs ensure accountability, comparability and the ability to monitor progress over time.

Together, the objectives and KPIs form a focused and practical roadmap. They ensure that material issues guide the standards we set and the actions we monitor, and that ESG becomes part of everyday practice across the Celnor Group.

CELNOR OBJECTIVES

OBJECTIVE REF	ECOVADIS THEME	ECOVADIS SUSTAINABILITY CRITERIA	PRIMARY SDG	ESG OBJECTIVE
OBJ1	Ethics	Corruption; Anti-competitive practices	SDG8	Strengthen ethical governance across Group companies
OBJ2	Ethics	Corruption; Anti-competitive practices	SDG8	Enhance reporting & whistleblowing mechanisms across Group companies
OBJ3	Ethics	Responsible information management	SDG8	Protect data and client confidentiality across Group companies
OBJ4	Ethics	Corruption; Anti-competitive practices	SDG8	Promote professional standards at Celnor
OBJ5	Labour & Human Rights	Working conditions	SDG8	Promote fair and ethical employment across Group companies
OBJ6	Labour & Human Rights	Working conditions; Social dialogue	SDG3	Support worker wellbeing across Group companies
OBJ7	Labour & Human Rights	Employee Health and Safety	SDG3	Strengthen health & safety compliance culture across Group companies
OBJ8	Labour & Human Rights	Career management & training	SDG8	Build leadership capability and career pathways across Group companies
OBJ9	Labour & Human Rights	Child labour, forced labour and human trafficking	SDG8	Strengthen Celnor group modern slavery compliance
OBJ10	Environment	Local & accidental pollution; Materials, Chemicals & Waste	SDG11	Strengthen environmental compliance culture across Group companies
OBJ11	Environment	Energy consumption & GHGs	SDG11	Strengthen energy and GHG emissions management across Group companies
OBJ12	Sustainable Procurement	Supplier environmental practices; Supplier social practices	SDG8	Strengthen sustainable procurement governance at Celnor



ETHICS

2026 OBJECTIVES: 1

Strengthen ethical governance across Group companies

We want our core values to be reflected in the way people work together across the Group, with a shared understanding of integrity, responsibility and collaboration. As the organisation continues to grow, it becomes increasingly important that colleagues, regardless of which company they originally joined, are guided by a shared set of expectations that support safe, fair and responsible decision making.

As new companies become part of the Group, adopting a single Code of Conduct and completing the associated training will give colleagues a clear and consistent view of what responsible behaviour looks like in their day-to-day work. This helps remove uncertainty, supports managers in setting expectations and enables teams to navigate complex or unfamiliar situations with confidence. A unified approach also makes it easier for leaders to demonstrate what good practice looks like, reinforcing the behaviours that underpin a healthy and accountable culture.

By embedding these shared standards early and consistently, we aim to strengthen trust with clients, partners and colleagues. Clear ethical expectations help ensure that decisions are transparent, fair and aligned with the Group's values, even as specialist teams work across different sectors and geographies. Over time, this creates a culture where people feel empowered to act responsibly, raise concerns where needed and contribute to a workplace defined by professionalism, respect and integrity.

KPI 1	100% of acquired companies to formally adopt the Group Code of Conduct during Onboarding Process
KPI 2	Develop and launch a Group Code of Conduct training module by the end of Q2 to support consistent ESG due diligence and ensure all colleagues understand the ethical standards required across the Group
KPI 3	Following launch of the new training module, 95-100% of all newly onboarded and acquired employees to complete Code of Conduct training within 60 days of their start/transfer date

2026 OBJECTIVES: 2

Enhance reporting & whistleblowing mechanisms across Group companies

Enhancing reporting and whistleblowing mechanisms is an important part of building a culture where people feel safe and supported when raising concerns. As more companies join the Group, colleagues bring with them different policies, procedures and levels of familiarity with formal reporting processes. It is important that each company continues to use its own whistleblowing policy, but it is equally important that everyone has access to clear guidance and a trusted route to seek help if they are unsure where to turn.

The Celnor Speak Up initiative is designed to support this, offering a simple framework to help companies strengthen or further develop their own whistleblowing arrangements, while also giving colleagues an alternative confidential channel if, for any reason, they do not feel able to use their local process. This dual approach respects the autonomy of each business while creating a common standard of protection across the Group.

By raising awareness of the support available, and by providing a consistent and secure way for concerns to be heard, Celnor aims to build confidence that issues will be handled fairly and responsibly wherever they arise. This strengthens ethical governance across the Group and helps foster a working culture where openness, accountability and respect are part of everyday practice.

KPI 4

Develop and implement the Group Whistleblowing policy, procedure, and confidential reporting mechanism by the end of Q2 to strengthen ethical governance and ensure all colleagues have a safe channel to raise concerns

2026 OBJECTIVES: 3

Protect data and client confidentiality across Group companies

Protecting data and client confidentiality is central to maintaining trust across the Group, particularly as Celnor continues to grow and bring together companies with different systems, technical capabilities and levels of digital maturity. Each business handles information in slightly different ways, but our clients and colleagues expect a consistent standard of care. Creating this shared foundation helps ensure that everyone understands their responsibilities and that sensitive information is protected reliably across all parts of the organisation.

Achieving Cyber Essentials certification across newly acquired companies will help establish a minimum and measurable level of cyber security. Many teams will already follow strong security practices, but certification provides structured assurance that key controls are in place and working effectively. It also gives colleagues confidence that their systems meet a recognised standard and helps reduce the risk of vulnerabilities as companies integrate into the wider Group.

Once certification is achieved, reviewing, updating and communicating each company's Data Security and Confidentiality Policy helps ensure that any improvements made during the process are fully embedded into day-to-day practice. This step reinforces good habits, strengthens awareness across teams and makes sure that enhanced controls are understood and applied consistently throughout the organisation. By taking the time to refresh local policies and share this information clearly, we can help each company translate technical security progress into practical behaviours that protect client and company data in their routine work.

KPI 5

Protect data and client confidentiality 95-100% of acquired companies to achieve Cyber Essentials certification within 18 months of acquisition Group companies

KPI 6

95-100% of Group companies to review, update and communicate their Information & Data Security Policy within 60 days of achieving Cyber Essentials certification



2026 OBJECTIVES: 4

Promote professional standards at Celnor

Improving and bringing together the various Celnor Group professional standards policies will help create a clearer and more coherent framework for the standards that guide our work. Over time, several policies have been developed to address related areas of professional conduct, including fraud, corruption, bribery, conflicts of interest, anti-competitive practices and other aspects of ethical behaviour, sometimes overlapping in scope or structure. Bringing these into a single, updated Ethics and Professional Standards Policy allows us to streamline the content, remove duplication and ensure the policy reflects recognised best practice, providing a clear foundation for the expectations set out in the Employee and Supplier Codes of Conduct.

The policy will also work in conjunction with our approach to Speaking Up, with the Celnor initiative offering straightforward guidance and a confidential way to raise concerns where people need advice or do not feel able to use local channels. Taken together, these steps will make expectations easier to understand and apply, support consistent decision making and help ensure that the principles shaping our professional culture remain relevant, accessible and aligned with Celnor's values as the organisation continues to grow.

KPI 7

Review and prepare a Group Ethics & Professional Standards Policy in line with international best practice, with Managing Director sign off, by the end of Q2



LABOUR AND HUMAN RIGHTS

2026 OBJECTIVES: 5

Promote fair and ethical employment across Group companies

Promoting fair and ethical employment across Group companies is an important part of building a consistent and responsible culture as Celnor grows. Newly acquired businesses can join the Group with different systems, documentation standards and approaches to pay, so it is essential that core employment expectations are brought into clear alignment early on. Ensuring that all employees are onboarded into the HiBob HR system, with right-to-work checks fully verified and recorded, helps establish a reliable and compliant foundation for managing people across the organisation.

Supporting companies to meet recognised minimum wage benchmarks for all directly engaged workers reinforces our commitment to fair treatment and strengthens confidence that people are being paid appropriately for the work they do. For some businesses, this may involve reviewing existing pay structures or strengthening local processes to meet consistent expectations across the Group. Embedding a minimum wage approach also helps create a more inclusive and supportive working environment, where people feel valued and where financial wellbeing is recognised as an important part of ethical employment. Taken together, these steps build stronger, more transparent employment practices and help ensure that the way we support and treat people reflects both our values and our responsibilities as an employer.

KPI 8

100% of employees in newly acquired companies to have confirmed right-to-work checks, within 60 days of acquisitions

KPI 9

100% of acquired companies to be assessed during due diligence to confirm that directly engaged workers are paid at or above the applicable statutory minimum wage in the jurisdictions in which they operate

2026 OBJECTIVES: 6

Support worker wellbeing across Group companies

Supporting worker wellbeing across Group companies is an important part of building a positive culture as Celnor grows. People joining from newly acquired businesses may be used to different levels of support, benefits or engagement around wellbeing, so offering a clear and accessible programme helps create a more consistent experience across the organisation. Encouraging companies to take part in an Employee Wellness Programme within their first year provides a structured way to promote health, connection and support in the workplace. For some, this may involve introducing resources for the first time, while for others it may mean strengthening or expanding what already exists.

By increasing participation in wellbeing activities, we aim to help create environments where people feel cared for, able to raise concerns early and more connected to the wider Group. Taken together, this approach supports healthier working practices and helps ensure that wellbeing becomes a meaningful and visible part of everyday life across Celnor.

KPI 10

95-100% of acquired companies to return decision regarding Employee Wellness Programme organisation implementation within 6 months of acquisition

2026 OBJECTIVES: 7

Strengthen health & safety compliance culture across Group companies

Strengthening the health and safety compliance culture across Group companies is an important part of ensuring that people remain safe as Celnor grows. Newly acquired businesses may follow different processes or standards, so establishing a clear and consistent baseline early on helps identify where support is needed and ensures that expectations are understood across a range of working environments.

Each acquired company will receive an in-person health and safety compliance audit carried out by a Celnor appointed specialist. This allows for a practical review of both documentation and day to day practices, as well as direct conversations with managers and workers to understand how systems operate in reality. The outcome provides a clear picture of strengths and any non-conformances, along with proportionate recommendations to help companies strengthen their approach.

Where improvements are needed, a corrective action plan will ensure that non-conformances are resolved within agreed timeframes, with follow up support provided where helpful. Over time, the audit programme will also highlight common themes and good practice that can be shared across companies. This structured approach helps build confidence in our processes and reinforces a culture where safety is treated as a shared responsibility across the Group.

KPI 11

100% of acquired companies to undergo a health & safety compliance audit within six months of acquisition, with all identified non-conformances addressed through a corrective action plan and closed out within agreed timeframes

2026 OBJECTIVES: 8

Build leadership capability and career pathways across Group companies

Building leadership capability and strengthening career pathways across Group companies is an important part of supporting a confident and well-prepared organisation. When new businesses join Celnor, the owners who previously led the company often step away as part of the transition. This creates a natural point for senior managers to step into broader leadership roles, often with new responsibilities, expectations and opportunities. Providing structured development at this stage helps people feel supported and gives them the tools they need to lead effectively within a larger and more interconnected organisation.

Ensuring that selected senior managers from each acquired company join the Leadership Development Programme soon after acquisition gives them practical guidance and a clearer understanding of what good leadership looks like within the Group. It also offers a valuable chance to connect with peers from other companies, share experiences, exchange ideas and learn from different approaches. These relationships help build confidence, encourage collaboration across the Group and support a more consistent and aligned style of leadership.

Alongside this, placing current and emerging managers onto the Management Development Programme helps develop a strong pipeline of future leaders. Many will be stepping into bigger or more complex roles, and targeted development gives them the support they need to succeed. The programme also provides opportunities for people to build networks beyond their own business, strengthening communication and helping individuals learn from each other's challenges and successes. Together, these programmes help create a more capable, connected and supportive leadership community across Celnor.

KPI 12

100% of acquired companies to have the current leader and selected senior managers offered places on the Leadership Development Programme within 90 days of completion

KPI 13

100% of acquired companies to have selected current and soon to be managers offered places on the Management Development Programme within 90 days of completion

2026 OBJECTIVES: 9

Strengthen Celnor Group modern slavery compliance

Strengthening modern slavery compliance across the Celnor Group will ensure our governance remains current and aligned with evolving expectations. With government guidance on modern slavery reporting updated in late 2025, this policy and statement refresh allows us to proactively reflect those changes. The update will clarify how risks such as forced labour, human trafficking and exploitation are identified and managed and set out clearer responsibilities across relevant functions.

Publishing the updated policy and statement will also improve awareness by setting out practical expectations, clear routes for raising concerns, and how modern slavery considerations link to procurement and contract oversight. It will sit alongside existing governance arrangements, including support available through the Group's People and Culture team, to ensure concerns can be raised safely and addressed appropriately.

Aligning our approach with the latest guidance will help ensure modern slavery risks are managed consistently, responsibly and transparently across the Celnor Group

KPI 14

Publish a modern slavery policy aligned with updated 2025 UK best-practice guidance, with Managing Director sign off, by the end of Q2



ENVIRONMENT

2026 OBJECTIVES: 10

Strengthen environmental compliance culture across Group companies

Strengthening the environmental compliance culture across Group companies is an important part of ensuring that Celnor continues to operate responsibly as we grow. Newly acquired businesses can join the Group with different levels of environmental awareness, varying local practices and differing levels of regulatory understanding. Establishing a clear and consistent baseline early on helps ensure that environmental responsibilities are understood and that operations across the Group meet the standards expected within our organisation.

To support this, each acquired company will undergo an environmental compliance audit within its first months in the Group. This process provides a practical assessment of how environmental risks are being managed, where current practices meet expectations and where improvements may be required. Any non-conformances identified through the audit will be addressed through a corrective action plan, with follow-up to ensure that actions are completed within agreed timeframes. This structured approach helps companies strengthen their systems and gives leaders assurance that environmental impacts are being managed appropriately.

Alongside this, all Group companies will be asked to submit an appropriate recycling and waste segregation policy and procedure that reflects the 2025 Simpler Recycling legislation in England and relevant rules in other locations. Ensuring these policies are clear, consistent and implemented in practice helps embed good environmental habits into day-to-day operations and reinforces the importance of responsible resource management. Together, these steps help build a stronger environmental compliance culture across the Group and support our commitment to operating in a way that minimises harm and aligns with our values.

KPI 15

100% of acquired companies to undergo an environmental compliance audit within six months of acquisition, with all identified non-conformances addressed through a corrective action plan and closed out within agreed timeframes

KPI 16

All Group companies to ensure appropriate recycling and waste segregation policy and procedures reflect the 2025 Simpler Recycling legislation for facilities in England and relevant local rules elsewhere, by the end of Q3

2026 OBJECTIVES: 11

Strengthen energy and GHG emissions management across Group companies

Strengthening energy and greenhouse gas emissions management across Group companies is an important step in understanding and reducing the environmental impact of our operations as the organisation grows. Acquired companies vary significantly in size, activities and data maturity, so establishing a clear and consistent approach to measuring emissions is essential. Building a complete and accurate picture of our energy use and emissions supports better decision making and helps identify where improvements will make the greatest difference.

Completing a full Group-wide inventory of Scope 1, Scope 2 and relevant Scope 3 emissions will help create this baseline. Bringing together consistent data from across companies allows us to understand where emissions arise, how they vary between different types of operations and where targeted action may be needed. Consolidating and verifying this data strengthens confidence in our figures and ensures that our approach to reporting reflects the expectations placed on a modern, responsible organisation.

Once this inventory is established, analysing carbon intensity will help identify the business units with the highest emissions relative to turnover. Understanding these patterns provides useful insight into where support, investment or operational changes could have the most meaningful impact. By taking this structured approach, we aim to build a clearer understanding of our environmental footprint, help prioritise areas for improvement and support a culture where energy and emissions management is part of everyday operational practice across the Group.

KPI 17

Complete a full Group-wide inventory of Scope 1, Scope 2, and relevant Scope 3 GHG emissions, with consolidated emissions data delivered within six months of the financial year-end

KPI 18

Complete a carbon-intensity risk analysis to identify the highest tCO₂e per £1m turnover business units within 90 days of inventory completion



SUSTAINABLE PROCUREMENT

2026 OBJECTIVES: 12

Strengthen sustainable procurement governance at Celnor

Strengthening sustainable procurement governance at Celnor will help ensure that the suppliers we work with understand and meet the environmental, social, ethical and governance standards that guide the Group. As our supplier base grows, having clear expectations becomes increasingly important to maintaining a consistent and responsible approach to procurement.

Developing a Supplier Code of Conduct will set out these expectations in a straightforward way, helping suppliers understand the standards we apply and supporting more transparent and consistent decision making. Alongside this, introducing a supplier onboarding questionnaire will help us assess new and existing suppliers in a structured and proportionate way, giving better visibility of risks and practices across the supply chain.

Together, these steps will strengthen Celnor's procurement governance, improve alignment with our values and help ensure that suppliers working with the Group operate in a responsible and sustainable manner.

KPI 19

Develop and implement a Celnor Group Supplier Code of Conduct by the end of Q3 to strengthen sustainable procurement practices and ensure all suppliers understand and adhere to Celnor's environmental, social, ethical and governance expectations

KPI 20

Develop and implement a Celnor Group supplier onboarding questionnaire by the end of Q3 to support consistent ESG due diligence and ensure suppliers are assessed against Celnor's environmental, social, ethical and governance standards

LOOKING AHEAD

Looking forward, we will continue strengthening ESG across the Group by making our expectations clearer, supporting colleagues and building more consistency as we grow.

We will use what we learn through integration and data collection to shape our next steps and keep improving how we track progress.

We will also stay close to the expectations of our colleagues, customers and wider stakeholders so that our approach develops in a way that is practical, relevant and easy to apply.



Programmes and activities will continue to evolve over the year, helping turn our ESG commitments into simple actions that make a positive difference across all Celnor companies.

CELNOR PEOPLE

Creating an environment where people feel valued, supported and able to grow is fundamental to Celnor Group's long-term success. As the Group continues to expand, we are investing in shared HR expertise, leadership development and practical support, while preserving the entrepreneurial culture and identity that makes each business unique.

We believe great organisations are built by helping people achieve their potential. By sharing knowledge, developing leaders and creating opportunities for learning and career progression, we enable our people to build rewarding careers while supporting the continued success of our businesses.

By combining Group-wide expertise with local leadership, we are creating workplaces where individuals can thrive, collaboration is encouraged and every business has access to the support it needs to succeed. This approach strengthens capability across the Group while recognising that our greatest asset will always be our people.



CELNOR RECRUITMENT

People are fundamental to Celnor Group's continued growth. Through our Central Talent Team, we provide specialist recruitment expertise that helps our businesses attract exceptional people through a consistent, fair and inclusive hiring process, strengthening capability and supporting sustainable growth across the Group.

We believe recruitment should be based on ability, potential and opportunity. By applying consistent hiring standards, we widen access to careers, improve candidate experience and help our businesses attract talent from the broadest possible range of backgrounds, experiences and perspectives.

As signatories to the Armed Forces Covenant and participants in the Disability Confident scheme, we are proud to support greater access to employment for veterans, reservists, military families and people with disabilities. These commitments form part of our wider ambition to remove barriers to employment, champion social mobility and work with organisations and initiatives that create meaningful opportunities for people who may otherwise face barriers to employment.



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“When I joined Celnor, my goal wasn't just to build a high-performing talent acquisition function, it was to create a recruitment approach that gives people a fair opportunity to succeed. For me, ESG starts with opening doors, removing barriers and assessing people on their potential. By doing that well, we strengthen our businesses while creating a positive impact in the communities we serve”

David Dawson, Group Head of Talent Acquisition



CELNOR LEADERS EVENT

Celnor host "Leaders events" around every 10 months which are open to all businesses.

These sessions are designed to offer our member companies a chance to:

- Connect and explore opportunities for cross-selling and collaboration
- Take part in shorter training sessions on a variety of topics
- Hear from our CEO on plans for the future and growth
- Hear from other businesses on the Celnor experience
- Hear from expert speakers on tailored topics
- Get updates on systems and processes being put in place by our enablement services team

“

"I found the day gave me a great opportunity to network with fellow Celnor members and also really appreciated the openness and informative talks from the Celnor team"

Mark Davies
Seed Environmental

LEARNING AT CELNOR

The Leadership Development Programme (LDP) and Management Development Programme (MDP) offered through Learn at Celnor are crafted to provide our colleagues with high-quality, relevant training. These programmes enable participants to strengthen their leadership skills, effectively develop their teams, and drive exceptional business outcomes. Beyond skill-building, Learn at Celnor fosters collaboration by creating valuable networking opportunities. Colleagues establish meaningful relationships across different the Group and with the Celnor team, building a supportive network that encourages knowledge sharing and cross functional teamwork.

	LEADERSHIP DEVELOPMENT PROGRAMME	MANAGEMENT DEVELOPMENT PROGRAMME
Who	Current leaders and selected senior members of their leadership team.	Current and soon to be managers.
What	Immersive development experience covering a range of technical business skills and leadership topics.	A 2 day overnight practical management development programme.
Why	This programme is designed to help you lead yourself and others effectively, focus on your personal development, and deepen your understanding of the Celnor way of working. It's an opportunity to grow as a leader, build confidence, and align your skills with the values and culture of the organisation.	This programme gives managers the skills and confidence to manage their teams more effectively. It also provides an opportunity to develop peer relationships and group collaboration.
When	2 cohorts of 12 a year.	Various groups throughout the year in different locations.
How	Celnor leaders make decisions based on business goals, alongside the aspirations and personal development objectives of their business leaders.	Current managers and those aspiring to step into management roles can self-nominate to their business leader or be nominated by their business leader.
Duration	16 days across 8 months.	2 days.

SALES DEVELOPMENT PROGRAMME

The Sales Development Programme (SDP), offered through Learning at Celnor, enables participants to strengthen their account management, sales, and client acquisition skills as well as provides opportunities for cross-group networking for colleagues.

Who	Staff at various levels across the business whose role currently involves or will involve sales and/or business development
What	Immersive development experience covering a range of account management, business development and lead generation skills
Why	This programme is designed to help you gain confidence in sales and business development, give you the skills to understand client needs and tenaciousness to successfully grow client accounts and spend, as well as generate new leads and acquire new clients..
When	4 to 6 cohorts of 12 a year.
How	Through understanding of sales processes and tactics and gaining the confidence to build relationships, the course should allow participants to grow their skills and career beyond technical excellence to a commercial and sales mindset
Duration	3 days across 2 months.



“

I've genuinely benefited so much from it and honestly wish I'd had this training years ago. It really helped put the world of sales into perspective, and I appreciated how it was tailored to technical sales rather than the typical 'pushy salesperson' approach I was half expecting. It reinforced a lot of what we already do, while also offering some great coaching techniques we can start applying to client relationships and negotiations.

Huw Kellett, Riverside ES

CELNOR ESG NETWORK

The Celnor ESG Network will be a new cross group community open to colleagues from any company. The group will bring together people who want to share ideas, raise challenges and help others understand what good ESG practice looks like in day-to-day work.

As part of the wider Celnor approach to responsible business, the ESG Network will offer insight from across the Group, highlight areas where support is needed and help build consistent ways of working as we continue to grow. They are not a decision-making body. Their role is to provide a collective, practical voice that helps make sustainability clearer, more connected and easier to apply across all companies.

They will also help Celnor stay connected to the expectations of wider stakeholders by sharing insight into emerging ESG trends, customer priorities, sector developments and opportunities to create social value. This will support the Group in understanding how sustainability expectations are evolving and how we can respond in a practical and proportionate way. By keeping these perspectives in view, the ESG Network will help ensure our ESG approach remains relevant, credible and aligned with the needs of those we work with.

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“Celnor ESG Network will be essential in providing the ESG Committee with new ideas and insights of what other businesses have been able to implement.

They embody our core values and are another example of collaboration across our member companies”

Rachel Cooper
ESG Lead

CELNOR GIVING

Celnor aims to make a positive contribution to the communities in which our companies operate. As the Group grows, we want our support for local initiatives and charities to be meaningful, relevant and connected to the interests of our colleagues. Each company is encouraged to engage with causes that matter to their teams through fundraising, volunteering or community partnerships, with matched funding available to help increase the impact of their efforts.

As part of this commitment, Celnor is proud to support the Armed Forces Covenant, a national promise that those who serve or have served in the Armed Forces, and their families, are treated with fairness and respect and should face no disadvantage when accessing public or commercial services. This reflects our intention to contribute positively to the wider communities we work in and to support groups that play a vital role across society.

We also work with local organisations, education providers and industry networks to help create opportunities for people to access skills, training and employment in areas where capability is in high demand. These relationships strengthen both our communities and the sectors we operate in, supporting long term social value.

Through these activities, we aim to be a constructive and trusted presence in our communities, building stronger local relationships and contributing to positive outcomes across the Group.



CELNOR EXPERTS

Celnor recognises the value that our colleagues bring to the wider industry and community through their involvement in professional bodies, standards organisations and expert panels. These roles help shape best practice, influence emerging guidance and support the development of safer, more sustainable and more effective approaches across the sectors we operate in. We encourage and support colleagues who choose to contribute in this way, acknowledging the expertise they bring and the positive impact their participation has beyond their day-to-day roles.

Where appropriate, we provide time, recognition and access to resources that help colleagues continue their contributions to these bodies. Their involvement helps strengthen Celnor's presence within the industry, builds valuable networks and ensures we remain connected to developments that matter to our clients, communities and the wider economy. This outward-facing engagement reflects our commitment to contributing to the long-term health and capability of the sectors we serve.





THANK YOU!

OUR ESG POLICY



Arrangements

Targets, Data & Reporting

We will set measurable ESG objectives aligned to this Policy, collect data against defined metrics and report performance quarterly to the ESG Committee and annually to the Board. External reporting will be proportionate to the Group's size, maturity and stakeholder expectations.

Risk Management & Compliance

ESG risks and opportunities are integrated into enterprise risk management, acquisitions and key decision-making. Celnor will comply with all applicable laws and expects equivalent standards from suppliers and partners.

Training and Awareness

Celnor will promote awareness of this Policy by providing proportionate guidance and support to employees, including onboarding for newly acquired businesses where appropriate.

Review

This policy is reviewed periodically to ensure it remains suitable, effective and aligned with legal requirements, Government guidance and Celnor's governance and wider ESG framework. Any significant updates will be communicated across the Group.

Approval

This policy has been approved by the Board of Directors of Celnor Group Limited.

Signed: 

Name: Simon Parrington
Title: Group Chief Executive
Date: March 2026